

Date: May 1, 2012

To: FCC

From: Susan Poling

RE: Digital Literacy

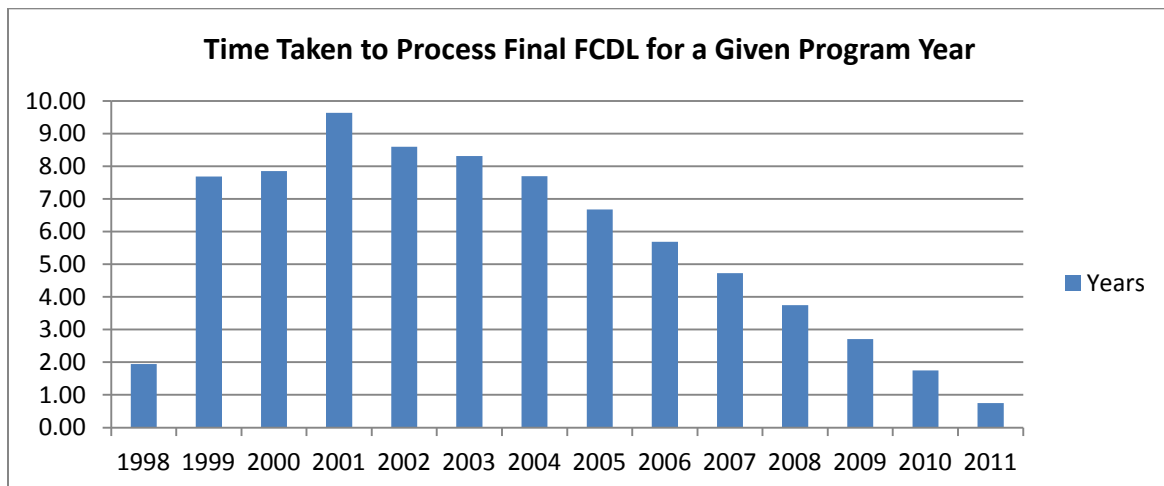
PROCEEDING NUMBERS: 11-42; 03-109; 96-45; and 12-23

I am a citizen of the state of Alabama. I have been employed as district level technology coordinator for 22 years. I have participated in the E-rate program since its inception. I have also had opportunities to develop, teach, and administer some small digital literacy projects in the past as part of school district offerings for stakeholders.

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The Schools and Libraries Division of the FCC should not be used to administer the Digital Literacy initiative for the universal service Lifeline program for the following reasons. Please consider the following:

1. The SLD was established to administer services for schools and libraries. Adding responsibilities of this new program would establish a precedent for mixing USF funds with appropriated funds, possibly changing the legal character of universal service fund.
2. The SLD has a big enough challenge in handling their current administrative duties in an effective timeframe. They are improving on their efficiency, but thousands of applications still take nearly a year or more of processing time.



3. The nature of administering a program of bidding and purchasing products and services with distinct technical functions is fundamentally different than administering temporary educational

programs. A digital literacy program which could include factors such as short term employment, curriculum development, and evaluation/accountability instruments is completely different from SLD's current tasks. Other entities or agencies which have overseen federal competitive grants with appropriate evaluation instruments and accountability components would be more effective administrators of this new digital literacy pilot program. Considering it is a pilot, I would expect that you would want to closely examine the effectiveness of the program in order to determine whether or not to continue it. Therefore, choosing the best equipped organization to administer and report back on such a program would be an important consideration as the program is put into place. The FCC document mentions other existing programs such as the BTOP, NBT, or NTIA which could be more suitable candidates to expand upon than the SLD.

Regardless of other functions of the universal services fund such as promoting digital literacy for all Americans (not just school children) and engineering a glide path that directs the U.S. economy onto a runway in the 'cloud,' the FCC can surely find a more suitable administrator for this pilot program than the Schools and Libraries Division.